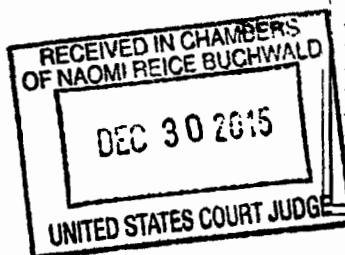


MEMO ENDORSED**POMERANTZ** LLP**MEMO ENDORSED**

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December 30, 2015

VIA ECFHonorable Naomi Reice Buchwald
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street – Courtroom 21A
New York, NY 10007-1312USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 01/04/2016

Re: *In re LIBOR-Based Financial Instruments Antitrust Litig.*, No. 11-MD-2262 (NRB);
The Berkshire Bank and Government Development Bank for Puerto Rico v. Bank of
America, et al., No. 12-cv-5723-NRB; and *Directors Financial Group v. Bank of*
America, et al., No. 13-cv-01016-NRB

MEMO ENDORSED

Dear Judge Buchwald:

We represent plaintiff Directors Financial Group ("DFG") in the above-referenced actions and write to request permission to file under seal DFG's loan origination and sale documents (the "Loan Documents") as well as our letter explaining how those documents demonstrate DFG's damages, which the Court ordered DFG to file and produce to Defendants by December 30, 2015. *See* ECF No. 1262.

The Loan Documents, which are attached as Exhibits A-G to DFG's letter explaining in further detail how it was damaged by the alleged suppression of LIBOR, contain personal information of DFG's clients, including name, home address, social security number, home phone number etc. The Loan Documents also contain other confidential information pertaining to DFG's customers and business. The letter contains references to the specifics of these loans.

We will publicly file a redacted version of the letter today. Upon filing the unredacted letter and Loan Documents under seal (if the Court so permits), we will produce copies of the documents to Defendants' liaison counsel in this action. Because there is no confidentiality order currently in place in this litigation, DFG requests that the Court deem these documents "CONFIDENTIAL" and order that until a confidentiality order is put in place in this action, defendants may only use the documents in connection with the defense of this action, and shall not disclose the documents to any person other than outside counsel of record for each party, members and associates of their firms and employees of those firms actively engaged in this

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Honorable Naomi Reice Buchwald
In re LIBOR-Based Financial Instruments Antitrust Litigation
11-MD-2262 (NRB)
December 30, 2015
Page 2

case; or experts or consultants retained by the party for the purpose of opining on matters to which the information is directly relevant.

Respectfully submitted,

POMERANTZ LLP

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cc: All counsel (via ECF)